

FILED 12 SEP '24 10:13 JSDC-ORP

United States District
Court of Oregon Portland Division

3:24-cv-1547 YY

William David Kerr
Plaintiff

-V-

Multnomah County, Sheriff
Nicole Morrissey O'Dannel, Medical
Director MCDC Dr. Lawson Eleaser

Declaration of
Rick Flynt

Rick Flynt hereby declares:

I have been housed on unit 6C-03 for the last 6 months - 4 of which I have worked along-side I/m David Kerr as one of the "Trustees" assigned to manage the cleaning of the unit, processing of laundry, and serving of meals on a unit of 32 I/m's. We have been neighbors for the last 4 months. we have spent nearly 15 hrs per day, 7 days a week in close proximity. I have observed I/m Kerr's daily habits, general activities, and mood from day to day. I/m Kerr is a headstrong, stable, goal-oriented guy w/ a family that he is still very much involved with while facing the challenge of his incarceration. His days are organized around his family, his job, ~~and~~ his personal studys, and his daily workout routine.

On 8-22-24 I witnessed I/m Kerr engaged in a conversation w/ the medication technician regarding his medication. His concern was that he did

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not recognize one of the pills he was being given. Once he was informed by the med-tech the conversation ~~the~~ progressed to him believing there must be some sort of mistake because he had not had any sort of conversation w/ his prescriber whatsoever.

Over the course of the next 48 hours I witnessed itching constantly. His mood had taken a severe turn for the worse. I witnessed him crying on more than one occasion. Normally we would spend several hours a day watching TV, walking / talking. But he had started sleeping for most of the day, where normally he works out every single day of the week, he quit working out completely. The next recreation period we had as a unit he was unable to play basketball for any more than 15-20 minutes because he couldn't breathe. After a few days his mood was markedly depressed. I attempted to check on him and tried to cheer him up. He wasn't receptive and even mentioned he ~~was~~ wished he could just go to sleep and never wake up. At this point I had called home to ask my family to google the possible pitfalls specific to his ~~meds~~ abrupt med changes. He began undertaking the task of advocating for himself by filing requests, medical request forms, grievances, and conversations w/ several correction staff and medical staff to no avail.

I declare under penalty of perjury that the above is true and correct to the best of my knowledge.

Executed at mCDE in Portland, Oregon on
9/9/2024.

#156668

Richard Flynt

A handwritten signature in blue ink, appearing to be 'R. Flynt', is written above a horizontal line.